

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES,	:	
Plaintiff,	:	
	:	CASE NO.: 08-cr-181 (TPG)
v.	:	
	:	
MARIO S. LEVIS,	:	
Defendant.	:	
.....	:	

NOTICE OF FILING

Defendant, **MARIO S. LEVIS**, through undersigned counsel files Exhibits 101 through 133 in further support of Defendant's Motion to Dismiss The Superseding Indictment Based On A Violation Of His Rights To A Speedy Trial (DE # 61) and Defendant's Memorandum Of Law In Support Of His Motion To Dismiss The Superseding Indictment Based On A Violation Of His Rights To A Speedy Trial (DE # 63). A copy of these exhibits was submitted to the Court during the Pre-trial Status Conference held on March 24, 2010.

Respectively submitted,

By: /s/ Roy Black
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(FL Bar No. 126088)
HOWARD SREBNICK, ESQ.
(FL Bar No. 919063)
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on March 25, 2010, I electronically filed the foregoing document through CM/ECF, which will then transmit a copy of the document to:

William Stellmach, AUSA
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/s/ Roy Black
ROY BLACK, ESQ.

USA v. Levis, 08 CR 181 (TPG)

EXHIBIT LIST RE
DEFENDANT'S MOTION TO DISMISS (SPEEDY TRIAL)

Exhibit #	Date	Description
101	2005 - 2006	SEC Staff Attorney Anthony's Correspondence with First BanCorp and R&G re documents
102	2006 - 2008 Feb	SEC Press Releases re Civil Settlements with Doral, First BanCorp and R&G
103	2008 March 6	USAO Press Release re Levis Indictment
104	2008 May 15 - June 4	Email string between AUSA Gujarati and Roy Black / Maria Neyra re proposed Federal Reserve Protective Order
105	2008 Sept 12 - 2009 May 21	Email string between AUSA Loughnane and Maria Neyra re proposed Federal Reserve Protective Order and Jewish Holidays
106	2009 May 27	Letter from Maria Neyra to Judge Griesa requesting adjournment to review additional discovery
107	2009 May 29	Email string between Maria Neyra and AUSA Stellmach re Federal Reserve Protective Order
108	2009 July 23 - August 7	Email string between Maria Neyra and AUSAs Stellmach, Braun and Anthony re "the remaining discovery"
109	2009 August 17	Email string between Maria Neyra and AUSA Stellmach with proposed Federal Reserve Protective Order attached
110	2009 August 17	Email string between Maria Neyra and AUSAs Braun and Stellmach re "missing" discovery
111	2009 August 17	Email string between Maria Neyra and AUSAs Stellmach, Braun and Anthony with proposed Federal Reserve Protective Order revised
112	2009 August 18	Transcript of Telephonic Hearing

Exhibit #	Date	Description
113	2009 August 26	Email from Maria Neyra to AUSA Anthony asking for First Bank docs
114	2009 Sept 15	Email string between Maria Neyra and AUSAs Stellmach, Braun and Anthony re proposed Federal Reserve Protective Order and Curcio issue
115	2009 Sept 16	Email from Maria Neyra to AUSAs Stellmach, Braun and Anthony suggesting that disclosure be limited to Black, Srebnick, Kornspan & Stumpf, PA, so that defense can get Federal Reserve documents
116	2009 Sept 16	Email from Maria Neyra to AUSAs Stellmach, Braun and Anthony forwarding emails from 2008 re Federal Reserve Protective Order
117	2009 Sept 23	Email from AUSA Stellmach to Maria Neyra re Federal Reserve Protective Order
118	2009 Sept 30	Email from AUSA Stellmach to Maria Neyra attaching Federal Reserve Protective Order revised
119	2009 Oct 1	Email from Maria Neyra to AUSAs Stellmach, Braun and Anthony stating no objection to Federal Reserve Protective Order as revised
120	2009 Oct 19	Email from AUSA Stellmach to Maria Neyra requesting an "executed copy" of proposed Federal Reserve Protective Order
121	2009 Oct 19-23	Email string between AUSA Stellmach and Maria Neyra with proposed Federal Reserve Protective Order: "no signature block for Roy . . . He agreed to it"
122	2009 Oct 23	Email string from Maria Neyra's paralegal to AUSA Stellmach "attach[ing] the cover letter and protective order as you requested"
123	2009 Oct 29 - Nov 3	Email string from Maria Neyra to AUSA Stellmach: "Any word on the status of the proposed protective order ..."
124	2009 Nov 3-4	Email from Maria Neyra's computer tech consultant (Mark Feur) and AUSA Braun requesting an "ETA on the availability of" Federal Reserve, Firstbank and R&G documents

Exhibit #	Date	Description
125	2009 Nov 11	Email from Maria Neyra to AUSAs Stellmach, Braun and Anthony reminding that Firstbank and R&G not yet produced
126	2009 Dec 1-4	Email from Maria Neyra to AUSAs Stellmach, Braun and Anthony responding to government suggesting a Protective Order for Firstbank and R&G documents
127	2009 Dec 7	Email from AUSA Stellmach to Maria Neyra attaching proposed Protective Order
128	2009 Dec 21	Letter from AUSA Stellmach to Roy Black enclosing CDs containing First Bank and R&G documents "[p]ursuant to Federal Rule of Criminal Procedure 16(a)"
129	2010 Jan 7	Letter from Roy Black to Judge Griesa requesting an adjournment of March 22, 2010 trial date
130	2010 Jan 26	Letter from Government to Judge Griesa opposing adjournment
131	2010 Jan 27	Transcript of Hearing
132	2010 Feb 2	Transcript of Hearing
133	2010 March 22	Government's Letter to Judge Griesa
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